

AFFIDAVIT OF  
MARK BONNETTE  
09/08/2020

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Michael “Dalton” Bickley,

Plaintiff,

v.

Lexington County School District 1; South  
Carolina Board of Education; South Carolina  
High School League; Lexington Baseball Club,

Defendants.

C.A. NO.: 3:19-cv-02598-SAL

**AFFIDAVIT OF MARK BONNETTE**

PERSONALLY APPEARED BEFORE ME, the undersigned, Mark Bonnette, being duly sworn according to the law, depose and say as follows:

1. I have been employed by Lexington County School District One (“the District”), for a total of 20 years. I am beginning my 8<sup>th</sup> year as the Baseball Head Coach for the River Bluff High School Baseball team.
2. I am familiar with the allegations in the above complaint that relate to me.
3. Dalton played baseball on River Bluff High School’s ‘B’ team when he was in 7<sup>th</sup> and 8<sup>th</sup> grade at Meadow Glen Middle School. The “B” team serves as a feeder baseball program for all upcoming players in the District so that they can be trained and coached by the District coaching staff in preparation for them joining the high school team.
4. I understand that in Dalton’s lawsuit, he complains about an incident during the Spring 2016 season where I called attention to the poor sportsmanship he exhibited on the field during a “B” team baseball game.

5. During that game, Dalton slid into the home plate and there was a collision with the catcher from the other team. The play was clean on both players' part, but after the collision, Dalton stood up over top of the catcher and flexed his arms and shouted at the catcher.
6. After the game during my usual postgame discussion with my team, I let Dalton and the team know that the kind of behavior he exhibited was totally unacceptable and would not be tolerated on the River Bluff Baseball team. I told the team that we will never "show up" or disrespect the opposing team or their players. I told Dalton if it happened again, he would no longer play for River Bluff. I would have said the same thing to any other player who had acted the way Dalton did.
7. I understand that in Dalton's lawsuit, he also complains about a phone call I made to him later that season. The reason for the call was that Dalton missed an off-season workout. I called to ask him why he was not there. He let me know in a very nonchalant and "smart-aleck" tone that he was working out with his personal trainer and he got a better workout with him instead of the team. I told him that our workouts were not only to help him get stronger, but to also to build relationships and work ethic with his teammates. I told him that he needed to be at our workouts or he could go play somewhere else. I never cussed him during this conversation, but I was stern with him about his attitude and missing our team workout. Later that night he called me back and apologized for his attitude and missing the workout. He told me it would not happen again.
8. I have high standard for my student athletes. If they exhibit behavior that is disrespectful to coaches, their teammates, other players, or the team itself, I will address it with them.

I feel this is my job and my duty as a coach. In both of the above instances, Dalton was being rude and disrespectful and I addressed it with him appropriately.

**AFFIANT FURTHER SAYETH NOT!**

Mark Bonnette 9/8/20  
Mark Bonnette Date

SWORN to before me this Tuesday  
day of September 8, 2020.

Lucas Clamp  
My Commission Expires: June 26, 2027

